

16 MARY CONQUEST, of lawful age, having
17 first been duly sworn, testified as
18 follows:

19

20 DIRECT EXAMINATION

21 BY MS. EDWARDS:

22 Q. Please state your name for the record?

23 A. My name is Mary Conquest.

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1 Q. By whom are you employed and in what
2 capacity?

3 A. I am a self-employed consultant currently
4 under contract to ITC^DeltaCom.

5 Q. Did you cause to be prefiled testimony in
6 this docket consisting of five pages?

7 A. Yes, I did.

8 Q. Okay. Do you have any changes or
9 corrections to your testimony?

10 A. No, I do not.

11 Q. Okay. If I asked the same questions,
12 would your answers be the same?

13 A. Yes, they would.

14 Q. Okay. Have you prepared a summary?

15 A. Yes, I have.

16 Q. Please provide that summary at this
17 time.

18 A. Thank you. Your Honor, the purpose of my
19 testimony was to describe three areas in
20 which BellSouth had failed to provide
21 either accurate data reporting or had
22 nondiscriminatory support of their OSS
23 systems. In my testimony I describe an

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1 audit or actually a sample of the
2 BellSouth Performance Measure and
3 Analysis Platform, the raw data commonly
4 referred to as the PMAP data. I describe
5 ITC^DeltaCom's concerns regarding the
6 change management process at BellSouth.
7 And I also talk about the disparity of
8 the OSS support systems or back office
9 systems.

10 I would like to start by
11 briefly recapping each of these items if
12 I may. In Alabama we were attempting to
13 look at some repair measures. The reason
14 these measures were chosen was because
15 there is more similarity in our back
16 office systems and we can better
17 correspond to the Bell measures in that
18 particular area.

19 The two areas that we looked at
20 were maintenance average duration for UNE
21 loops and customer trouble report rate
22 for UNE loops. The manner in which we
23 approached this was to take our own
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1 internal tickets. From these tickets
2 then we began to look at the raw data
3 contained in the PMAP information. As
4 stated in my testimony, there were
5 tickets which were not contained in this
6 data source.

7 As a result of this, on behalf
8 of ITC^DeltaCom, I recommend that the
9 Commission establish measures and appoint
10 an independent third-party to audit Bell
11 reporting and to administer corrective
12 action plans. Data collection for the
13 small CLEC is a very cumbersome and a
14 very difficult process to manage.
15 Differences in the back office systems
16 and the internal service measures that
17 make it very difficult for us to do an
18 adequate job in auditing the measures
19 that's being applied.

20 Mr. Varner, in rebuttal to my
21 testimony, stated that inaccuracies in
22 BellSouth's metric reporting would not in
23 and of themselves have a materially

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1 adverse impact on competition. I would
2 have to disagree with that. I believe
3 that the metrics serve as a tool by which
4 all Alabama customers can benefit. I
5 believe that the CLEC can benefit as well
6 as BellSouth. If we have a benchmark
7 with which to measure by, then we can
8 certainly all work to improve.

9 Second, BellSouth's change
10 control process is the process by which
11 the CLECs and supposedly BellSouth
12 request interface changes. Yesterday, in
13 Mr. Bradbury's testimony, he addressed
14 the same issues. Today the change log
15 currently is growing. The issues with
16 the growth in this arena are that the
17 number of releases available to make
18 enhancements and changes to enable the
19 CLECs to better do their business are
20 very, very limited.

21 In 19 -- well, excuse me, in
22 2000 there were roughly 79 items that
23 were delivered that the CLECs had asked
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1 or requested for. These included both
2 the manual items and the electronic
3 items. It appears that we will receive
4 approximately the same number this year.
5 And I learned this week, and I hope it's
6 okay to go there, Nanette, that BellSouth
7 is proposing that for 2002 there will
8 only be five releases. So if we follow
9 that schedule and they adopt that
10 particular schedule, it in essence means
11 that any major changes that the CLECs
12 hope to apply will not be delivered
13 before August of 2002.

14 Minor changes defined by
15 BellSouth in their process are things
16 which in theory do not cause back office
17 changes to the CLECs' operating systems.
18 In other words, they typically relate
19 more to things internally to BellSouth.
20 BellSouth also has the added ability to
21 make stability changes which enhance
22 their performance. These both, I guess,
23 apply as a double-edged sword for us, in
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1 that it helps us to have a more stable
2 environment, but it also means that our
3 items are not on equal priority with
4 theirs.

5 The last thing I would like to
6 talk about is the disparity of the
7 Operational Support Systems. Again, Mr.
8 Bradbury briefly addressed this, the fact
9 that the retail unit in the Bell
10 environment are able to see pending order
11 flags and actually call up pending
12 service orders, as opposed to receiving
13 clarifications of the orders as they are
14 processed. This one service delivery
15 item causes discriminatory treatment in
16 that for my customers at ITC^DeltaCom,
17 service appointments are delayed.

18 Mr. Ruscilli, in his rebuttal
19 to my testimony, says that I really
20 shouldn't complain to you about my lack
21 of UNE-P documentation. I guess I have
22 to ask, how can we protect our
23 customers? We have to be able to voice

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1 our concerns somewhere.

2 BellSouth's training materials
3 for UNE-P did not address the complete
4 provisioning and the billing impacts to
5 our customers. Nowhere in the material
6 did it state that trunk rolls would
7 occur, or that we must subscribe to the
8 access daily usage file commonly referred
9 to as ADUF. We have participated
10 extensively to gain knowledge with the
11 UNE-P workshops, and certainly are making
12 progress in our understanding of this
13 service offering, but because of the lack
14 of clear and complete training and
15 reference materials, our customers suffer
16 and we lose customers and we lose their
17 confidence.

18 In summary, I ask the
19 Commission to establish a metric and to
20 appoint an independent third-party to
21 audit the Bell reporting. I believe that
22 BellSouth has failed to demonstrate
23 nondiscriminatory treatment in its OSS

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1 system support and has thus failed to
2 comply with the 271 relief requirements.
3 On behalf of ITC^DeltaCom, I respectfully
4 ask the Commission to address the issues
5 that have been raised in my testimony.

6 Thank you.

7 MS. EDWARDS: Subject to
8 cross-examination, we ask that
9 the prefiled direct testimony
10 be admitted into the record and
11 the witness is available for
12 cross.

13 (Prefiled testimony of Mary
14 Conquest.)
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1 CROSS-EXAMINATION

2 BY MR. EDENFIELD:

3 Q. Good afternoon, Ms. Conquest, how are
4 you?

5 A. Good. Thank you.

6 Q. Fortunately, we're getting ready to head
7 to the barn. We'll try to get this done
8 quickly. Were you retained by DeltaCom
9 specifically to testify in 271, or do you
10 have other functions that you perform for
11 them as well?

12 A. No. I basically run their ILEC
13 gateways. I'm a project manager for
14 them. I serve as the integrator on their
15 behalf and other functions.

16 Q. Well, in that capacity, are you familiar
17 with the time it takes for the DeltaCom
18 reps to type in orders into your own back
19 systems?

20 A. Yes, I am.

21 Q. How long is that?

22 A. Depending on the order and depending on
23 the accuracy of the data provided them,

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1 there's a very large range of different
2 times. If you would like to be specific
3 as to a req type or a service type, then
4 I can give you a better answer.

5 Q. Simple versus complex. How about a
6 simple? Give me a range in a simple and
7 give me a range in a complex.

8 A. Well, the complex order, assuming that
9 all of the information is correct, could
10 take somewhere in the neighborhood of
11 half an hour to half a day actually.

12 Q. Okay.

13 A. The very simple ones you touched briefly
14 on yesterday, and I probably shouldn't
15 volunteer this, but for resale we have
16 some in-house mechanization and we are
17 able to do those in just minutes, we do
18 order generations for very simple resale
19 orders.

20 Q. Five minutes or less; ten minutes or
21 less?

22 A. Less than. Less than.

23 Q. Wow, that's pretty good. And then that
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1 would assume that all of your data was
2 correct?

3 A. Yes.

4 Q. Now, do you have any experience with, if
5 the data is not right, what kind of time
6 frame that would add to the timing?

7 A. The time frame varies according to whose
8 data is incorrect and the nature of the
9 incorrect data.

10 Q. Let's assume it's DeltaCom's data that's
11 incorrect.

12 A. We have the ability to correct that
13 almost immediately.

14 Q. How do you do that?

15 A. We have our own proper proprietary
16 system, depending on whether it's data
17 that's repository on our AS/400, which is
18 our billing, customer -- master customer
19 data record, or whether it's in our STARS
20 tracking system. We log in and we enter
21 the data.

22 Q. I guess that's a functionality y'all have
23 added to your own systems?

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1 A. Yes, it is.

2 Q. Okay. Could you give me an estimate of a
3 percentage of those that would take half
4 a day as to those that might take a full
5 day or half an hour?

6 A. I think that varies on a given time in
7 the month and on a given day. We have
8 closeouts where our sales forces are
9 giving us -- well, like in your
10 situation, whatever is the sale of the
11 month, you have a ton of orders come in
12 for that particular product offering and
13 then you have stragglers throughout and
14 it varies. I don't think that would be a
15 fair thing to do. I'm not the
16 statistician for DeltaCom.

17 Q. And I would not try to hold you to any
18 specific, you know, data numbers, but I'm
19 just trying to get an idea. Maybe we can
20 take it on peak times and non-peak
21 times. Suppose you've got a big sale
22 going on on whatever the service of the
23 month is, can you give me an idea of what

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1 percentage, during the peak times, the
2 heavy times, would be taking a half an
3 hour versus a half a day? And then I
4 will ask you the same thing for when the
5 times are not so busy.

6 A. That would be a purely guesstimate on my
7 part and I would be hesitant to guess.

8 Q. You cannot make a -- from your experience
9 with their systems as their paid
10 consultant, you can't give me a
11 reasonable estimation?

12 MS. EDWARDS: Your Honor, she
13 answered the question. If she
14 doesn't know, she doesn't know.

15 JUDGE GARNER: Either she knows or
16 she doesn't. If you're not
17 comfortable making that
18 estimate --

19 A. That's not my area of support. I mean, I
20 can estimate that it would be roughly 60
21 percent that would take longer, but it's
22 an estimate.

23 Q. Okay. That's fine. Has DeltaCom
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1 integrated its ordering and pre-ordering
2 interfaces?

3 A. Yes, sir, we have.

4 Q. When did you accomplish that?

5 A. Last year.

6 Q. What is your ordering interface and your
7 pre-ordering interface?

8 A. My pre-ordering interface is TAG.

9 Typically my ordering interface is
10 normally EDI. It can also be LENS; it
11 can also be manual; and in some cases, if
12 a vendor is acting on our behalf, it is
13 also TAG.

14 Q. Okay. Thank you.

15 A. You're welcome.

16 Q. Now, let's jump into some of this
17 testimony. As I understand it, you
18 performed an audit of the Alabama PMAP
19 data on the maintenance average duration
20 UNE loops and the customer trouble report
21 rate UNE loops for February 2001?

22 A. I think sample is probably -- audit or
23 sample, yes.

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1 Q. I said "audit," would you prefer me to
2 use another word?

3 A. I did not attempt to go count the
4 DeltaCom tickets and compare those to the
5 Bell tickets.

6 Q. Okay. I'll get, in just a second, into
7 the detail of what you did, but I'm just
8 trying to make sure I understand what
9 you're saying here.

10 A. Okay.

11 Q. And are you saying that as a result of
12 your having gone in and what I'm calling
13 an audit or taken your sample, you've
14 determined on your own that the BellSouth
15 PMAP data is flawed, I think is the word
16 you used?

17 A. Yes, we have.

18 Q. Okay. Do you have a Ph.D in any type of
19 accounting or auditing specialty?

20 A. No, I do not.

21 Q. How about a Master's degree?

22 A. I have a Master's for project management,
23 but not for statistician work. This was

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1 a much simpler process, if I might
2 answer. This was a matter of just taking
3 my tickets for a particular category that
4 were in my own back office system,
5 accessing my data, and then comparing my
6 data to your raw data.

7 Q. Okay.

8 A. Nothing sophisticated.

9 Q. I'm sorry, I didn't mean to interrupt
10 you. Let's take a look at that then.

11 A. All right.

12 Q. As I understand it, you've looked up two
13 trouble tickets that DeltaCom had sent to
14 BellSouth?

15 A. Actually for this particular category
16 there were four trouble tickets.

17 Q. All right. You mentioned two in your
18 testimony, did the other two match up?

19 A. Yes, they did.

20 Q. Have you provided BellSouth a phone
21 number or any other type of
22 identification for the other two trouble
23 tickets?

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1 A. No, sir, I have not. They haven't asked
2 me for that, but I would be happy to give
3 them the tickets, with counsel's
4 approval.

5 Q. That would be great.

6 MR. EDENFIELD: Could we get that
7 information? Could we ask for
8 that as a late-filed exhibit?

9 MS. EDWARDS: Yes, you can.

10 Q. Do you know the numbers on the other two
11 trouble tickets? Do you have that with
12 you here?

13 A. Yes, I do.

14 Q. What are those?

15 A. Let me make sure I understand your
16 question. Are you asking me for --

17 MS. EDWARDS: Which trouble tickets
18 are you referring to?

19 A. -- the ones that are in my testimony or
20 the ones that matched?

21 Q. I'm sorry, the ones that match. The two
22 that didn't, the numbers are actually in
23 your testimony, right?

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1 A. No, they're not. My ticket numbers are
2 in my testimony. Your telephone numbers
3 are not in my testimony.

4 Q. I'm sorry, I was talking ticket numbers.
5 If you actually have telephone numbers
6 here, that would be great.

7 A. Okay. I do not have the telephone
8 numbers for the two tickets that are not
9 in the testimony.

10 Q. Okay. That's fine.

11 A. If I said that correctly. I can give you
12 the ticket numbers.

13 Q. Okay. You are going to give me the
14 telephone numbers as a late-filed exhibit
15 on the two that are not in your
16 testimony, and now you're going to give
17 me the trouble ticket numbers of the two
18 that are not in your testimony?

19 A. How about we make this really simple?
20 How about I give you the telephone
21 numbers for all four?

22 Q. That would be great. Now, do you have
23 the two ticket numbers for the ones that

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1 are not in your testimony?

2 A. Yes, sir, I do.

3 Q. What are those?

4 A. The ticket number is 10137785.

5 Q. All right. Wait a minute. I don't do

6 numbers, so you have to go slow.

7 A. Sorry. 10137785.

8 Q. Okay.

9 A. The second one is 10138092.

10 Q. And are these numbers assigned by the

11 BellSouth system?

12 A. No, sir. These are my ticket numbers out

13 of my back office system.

14 Q. All right. So these are numbers that

15 DeltaCom systems assign to trouble

16 tickets --

17 A. Yes.

18 Q. -- that are then sent on to BellSouth's

19 systems?

20 A. Correct. My people actually create a

21 ticket in my own back office system

22 referred to as REMEDY, and then also

23 enter this into the BellSouth TAFI

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1 system.

2 Q. So what's entered into TAFI is the
3 DeltaCom number?

4 A. Actually I believe they enter your
5 telephone numbers, I believe.

6 Q. Okay. What I'm trying to figure out is
7 what exactly were you looking for when
8 you went into the BellSouth PMAP system?
9 Were you looking for telephone numbers --

10 A. I was looking for telephone numbers, yes,
11 sir.

12 Q. Okay.

13 A. I thought that would be the fastest way
14 to match the data.

15 Q. All right. So you weren't looking for
16 these trouble ticket numbers that you
17 have in your testimony?

18 A. No, sir.

19 Q. Give me the telephone numbers, if you
20 would, of the two orders that are in
21 your -- I mean, the two trouble tickets
22 that are in your testimony?

23 A. Okay, sir.

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1 MR. GENTLE: Why don't we approach?

2 MR. EDENFIELD: I think I can

3 short-circuit this, Mr.

4 Gentle. I think I know what

5 the problem is.

6 MR. GENTLE: The problem is it's a

7 trade secret.

8 MS. EDWARDS: Well, no, it's my

9 customer's phone number.

10 MR. EDENFIELD: Trade secret?

11 Telephone numbers don't

12 necessarily qualify as trade

13 secrets.

14 MR. GENTLE: Well, if it relates to

15 a specific customer it is.

16 MR. EDENFIELD: But certainly --

17 MR. GENTLE: We've got some

18 competition in the audience.

19 JUDGE GARNER: Let's go off the

20 record.

21 (Off-the-record discussion.)

22 JUDGE GARNER: All right. Let's go

23 back on the record. I believe

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1 Mr. Edenfield can give us an
2 explanation of how we're going
3 to handle this situation with
4 the telephone numbers. We're
5 no longer going to make them a
6 late-filed exhibit.

7 MR. EDENFIELD: That's correct.
8 We're no longer asking that
9 telephone numbers be made a
10 late-filed exhibit; we withdraw
11 that request. However,
12 DeltaCom has agreed to provide
13 the four telephone numbers to
14 us under proprietary protection
15 outside of the hearing.

16 JUDGE GARNER: And that's acceptable
17 to DeltaCom?

18 MS. EDWARDS: Yes.

19 Q. Now, do you understand that when a
20 trouble ticket is entered into TAFI that
21 TAFI assigns its own number?

22 A. Yes, I do.

23 Q. Did you have those numbers?

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1 A. I don't believe I do.

2 Q. Have you ever had those numbers?

3 A. In my back office system, I believe
4 they're only entered as a note entry.

5 No, I have not had your TAFI numbers.

6 Q. All right. So when you went to look for
7 the trouble tickets in the PMAP data, you
8 did not have the TAFI trouble ticket
9 assigned by BellSouth number?

10 A. No. I do not have that. I can only look
11 by the telephone number. I do have note
12 entries on my tickets that says, "I
13 tested lines in TAFI; they tested okay.
14 Will keep trying to get in touch with the
15 customer." Both tickets have TAFI
16 references in the ticket history in my
17 system.

18 Q. And I assume you are aware that the PMAP
19 data is currently being audited by KPMG
20 in Georgia and Florida?

21 A. I am.

22 Q. And I assume that you are not here trying
23 to assert your opinion over that of KPMG?

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1 A. Absolutely not.

2 Q. So you would -- if KPMG finishes its
3 audit with its horde of accounting types,
4 I assume you would be satisfied if they
5 are?

6 A. That would be correct.

7 Q. And you had mentioned one other issue --
8 well, maybe a couple of others, but what
9 I wanted to talk about was you had
10 mentioned something about call flow
11 record identification in your testimony?

12 A. Yes, sir, I did.

13 Q. Have you seen the -- read the rebuttal
14 testimony for BellSouth?

15 A. Yes, I have.

16 Q. Are you aware now that we are providing
17 what you were asking for as of, I
18 believe, July 1st?

19 A. Yes. We are also taking advantage of
20 some of your training sessions that will
21 be in your in-forum. And I believe there
22 is a training class that you are
23 deploying in September. My point was at
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